

EXHIBIT A

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- At LightSmith, Mr. Holmberg has conceptualized and implemented a cost model and production plan for a 19" high volume AMLCD manufacturing facility utilizing generation 3.5 substrates.
- At LightSmith, Mr. Holmberg has conceptualized and implemented a cost model and production plan for a 19" high volume AMLCD manufacturing facility utilizing generation 3.5 substrates.
- As an inventor, Mr. Holmberg has established a patent portfolio relating to fabricating active circuits on plastic substrates and equipment to dry etch Indium-Tin-Oxide (ITO) at LightSmith. (ITO is commonly used to coat glass substrates for LCDs and AMLCDs.)
- Prior to joining/founding LightSmith, Mr. Holmberg spent six years (1992 to 1997) founding and running a startup company called Image Quest Technologies, Inc. ("IQT"). As President and CEO of IQT, Mr. Holmberg was in charge of R&D, engineering, manufacturing, sales, marketing, and finance for the company. Specifically, Mr. Holmberg secured a multimillion dollar contract for developing AMLCDs for commercial, military, and avionics applications, and successfully developed two high performance AMLCD products for military and avionics applications. (Most of the contemporary LCD applications are based on AMLCDs.)
- In 1991 and 1992, prior to founding IQT, Mr. Holmberg founded and operated a consulting group, Advanced Display Technologists, serving the semiconductor and display industries. While there, Mr. Holmberg invented a high yield AMLCD process based on Amorphous Silicon Thin Film Transistors (TFT); he also developed business plans and cost models for the development and production of AMLCDs.
- From 1982 to 1989, Mr. Holmberg was Senior Vice President of Operations at Alphasil, Inc., which he co-founded. There, Mr. Holmberg successfully designed and developed one of the worlds' first fully functional 3" diagonal AMLCDs, and also designed and fabricated the company's first color AMLCD.

EXHIBIT B

Atlanta

Denver

Los Angeles

Philadelphia

**McKenna Long
& Aldridge**
Attorneys at Law

1900 K Street, NW • Washington, DC 20006
202.496.7500 • Fax: 202.496.7756
www.mckennalong.com

San Diego

San Francisco

Washington, DC

Brussels

GASPARE J. BONO
(202) 496-7211

February 23, 2006

EMAIL ADDRESS
gbono@mckennalong.com

BY U.S. MAIL AND E-MAIL

Christine A. Dudzik, Esq.
Thomas W. Jenkins, Esq.
321 North Clark Street
Suite 3400
Chicago, IL 60610

Robert W. Whetzel, Esq.
Matthew W. King, Esq.
One Rodney Square
P.O. Box 551
Wilmington, DE 19899

Re: *LG Philips LCD Co. v. Tatung Co. of America, et al.*, C.A. No. 05-292-JJF

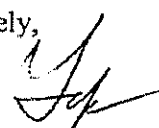
Dear Counsel:

Pursuant to ¶ 2(b)(ii) of the Stipulated Protective Order, we are identifying the following individual as a consulting expert:

Scott H. Holmberg
3106 Las Palmas Avenue
Escondido, CA 92025

Furthermore, also pursuant to ¶ 2(b)(ii), I am also enclosing a copy of Mr. Holmberg's curriculum vitae and a listing of Mr. Holmberg's consultancies and all cases in which Mr. Holmberg has been deposed or testified at trial within the last four years.

Sincerely,


Gaspare J. Bono

Enclosures

Scott H. Holmberg

3106 Las Palmas Ave.
Escondido, CA 92025
E-mail: holmberg@cox.net

Tele: (760) 233-0789
Fax: (760) 233-1090
Cf: (760) 500-0020

Highlights of Qualifications

- Over 30 years of Management and Engineering experience in the semiconductor and electronic display industry ranging from start-ups to established companies
- International marketing and business skills with full P&L responsibility
- Designed and developed one of the world's first fully functional Active Matrix Liquid Displays (AMLCD) in 1982
- Oversaw the staffing, design, construction, equipment setup and operation of two AMLCD facilities in Fremont, CA
- Proven capability in implementing productivity enhancement tools (TQM, SPC & DOE) and ISO 9001 Programs
- Perceived and implemented success oriented training programs and Incentive Stock Option Plans (ISOP) for employees which lowered the turnover to less than 3% per year
- Established cost savings techniques to increase profitability

Professional Experience

LightSmith, Inc., Escondido, CA
President and CEO

1997-Present

Conceptualized, demonstrated proof of concept and patented a number of approaches for fabricating poly-silicon active circuits on plastic substrates. Patented a unique system design for dry etching Indium-Tin-Oxide (ITO) on glass or plastic substrates. Provided Business and Technical consulting for a number of multi-national companies in the areas of Transmissive MicroDisplays, AMLCD's, Field Emission Display (FED) technology and digital X-ray sensors.

Achievements

- Invented and filed a portfolio of patents relating to fabricating active circuits on plastic substrates and equipment to dry etch ITO films
- Assisted in the business planning and technical development of a SVGA MicroDisplay for a start-up company
- Made significant contributions in the analysis and understanding of failure modes and instabilities in FED's
- Developed a complete 10 year business plan for the development and production of X-ray sensors for the medical and industrial marketplace
- Conceptualized and implemented a cost model and production plan for a 19" high volume AMLCD manufacturing facility utilizing generation 3.5 substrates

Image Quest Technologies, Inc., Fremont, CA
President and CEO

1992-1997

Founded Image Quest Technologies, Inc. in 1992 and secured a \$22 million equity and development contract from Hyundai Electronics for the development of Active Matrix Liquid Crystal Displays (AMLCDs) for commercial, military and avionics applications. Oversaw all startup activities including staffing, site selection for company, design of clean rooms and support equipment, writing purchase and acceptance specifications for \$12 million of development and production capital equipment. Responsible for all profit and loss aspects of business operations including R&D, engineering, manufacturing, sales, marketing and finance.

Achievements

- Successfully developed two high performance AMLCD products for military and avionics applications
- Secured over \$10 million in backlog orders prior to product introduction
- Trained over 60 Hyundai engineers in AMLCD technology and aided them in successfully starting up a \$600 million AMLCD facility in Korea
- Initiated a Total Quality Management (TQM) and ISO 9001 program for the company which increased employee awareness and pride
- Implemented success oriented training programs for all employees, which increase morale and reduced employee turnover to less than 3% per year — lowest of the Hyundai subsidiary companies
- Trained employees on productivity enhancement tools such as Statistical Process Control (SPC) and Design of

Experiments (DOE) which helped employees monitor the fabrication process and increase yield

Advanced Display Technologists, Pleasanton, CA

1991-1992

Founder and Senior Consultant

Founded the consulting group in 1991 to provide services related to the semiconductor and display industries.

Achievements

- Invented and documented a new high yielding AMLCD process based on Amorphous Silicon Thin Film Transistors
- Developed business plans and cost models for the development and production of AMLCD's

Coloray Display Corporation, Fremont, CA

1989-1991

Vice President, Semiconductor and Process Development

Co-founder of Coloray Display Corporation, which was founded to develop and manufacture Field Emission Displays (FED's) — a new vacuum microelectronic display technology. Primary responsibilities were in the area of process development of the Field Emitter substrate.

Achievements

- Invented and patented a number of new concepts relating to process improvements of FED's
- Developed the corporate technology plans and production cost models for FED's
- Successfully demonstrated the operation of Field Emission Array's (FEA's) on glass substrates

Alphasil, Inc., Fremont, CA

1982-1989

Senior Vice President of Operations

Co-founded the company in 1982 to develop and manufacture AMLCD's for commercial, military and commercial applications. Primary responsibilities were in the area of Operations, which included technology development, and manufacturing.

Achievements

- Successfully designed and developed one of the world's first fully functional 3" diagonal AMLCD's in 1982 utilizing rented equipment and facilities
- Initiated the company's intellectual property program, which included filing of patents and developing a trade secrets policy
- Aided in writing a business plan and subsequent negotiations, which culminated in a \$7.5 million agreement with Sperry Corporation to develop and manufacture AMLCD's for military and avionics applications
- Selected and negotiated \$4 million worth of AMLCD manufacturing equipment
- Hired a critical management team with backgrounds in semiconductor, liquid crystal and systems design, and integrated their talents to develop AMLCD's
- Designed and managed the engineering and construction of 6,000 square feet of class 100 clean rooms in the Fremont facility for development and production of AMLCD's — the first of its kind in North America (1987)
- Initiated the design and development of a 640 x 400 pixel AMLCD panel utilizing amorphous silicon thin film transistors. Established cumulative production yields of 45% on the active matrix glass utilizing patented processing techniques and redundancy schemes
- Designed and fabricated the company's first color (6.4" diagonal) AMLCD in 1988, and completed the development of 5 custom monochrome displays for military and avionics applications

Energy Conversion Devices, Inc., Troy, MI

1979-1982

Senior Staff Engineer

Recruited back from Burroughs Corporation to continue the development of the ECD Ovonic Memory Switch (OMS), Ovonic Threshold Switch (OTS) and other semiconductor related technologies. Responsibilities included staffing, product conception and development, and technology transfer to licensees for manufacture

Achievements

- Invented and supervised the development of a high-density vertical anti-fuse PROM device made from amorphous materials
- Successfully supervised personnel at various semiconductor manufacturers to demonstrate the manufacturability and reliability of vertical PROM devices
- Designed and developed thin film transistors and diodes made from amorphous materials
- Filed numerous patents on device structures utilizing amorphous materials
- Assisted management in successful negotiations with technology licensees

Burroughs Corporation, San Diego, CA

1975-1979

Project Engineer

Transferred from Energy Conversion devices to Burroughs Corporation in 1975 to integrate the Ovonic Memory Switch (OMS) with Burroughs bipolar current mode logic technology. Primary responsibilities were in the area of test, failure analysis and device development.

Achievements

- Successfully completed the development, test procedure and reliability testing which led to product qualification and product delivery to customers
- Developed and patented a new Electrically Alterable Read Only Memory (EAROM) device which solved infant mortality and lifetime problems
- Promoted to Project Manager for PROM and EAROM products which included overseeing Engineering, Manufacturing and testing of all PROM and EAROM products

Energy Conversion Devices, Inc., Troy, MI

1968-1975

Technician/Project Engineer

Hired as a research technician to perform early scientific work and material science involving amorphous materials

Achievements

- Completed a college engineering degree at Wayne State University during evening sessions while working full time at ECD
- Supervised the design and layout of a 1024 bit EAROM integrated memory chip after graduation. Responsibilities include assuring compatibility between layout, circuit design and amorphous and single crystalline manufacturing process
- Established testing and reliability procedures for amorphous memory devices

Bendix Research Laboratory, Southfield, MI

1966-1968

Research Technician

Performed experiments on optical and electronic effects in crystalline solids and aided in the analysis and interpretation of the experimental results.

U.S. Coast Guard

1962-1966

Electronics Technician (ET-1)

Professional Affiliations

Society for Information Display (SID)

The International Society for Optical Engineering (SPIE)

Education

Wayne State University, Detroit, Michigan, B S E.E.

Patents

Twenty-one Issued Patents
One Patent Pending

List of Issued Patents

| | Pat. No. | Title |
|----|-----------|-----------------------------------------------------------------------------------------------------------------------|
| 1 | 6,613,650 | Active matrix ESD protection and testing scheme |
| 2 | 6,160,270 | Performance matrix, method of making an active matrix displays incorporating an improved TFT |
| 3 | 6,066,506 | TFT, method of making and matrix displays incorporating the TFT |
| 4 | 5,954,559 | Color filter structure and method of making |
| 5 | 5,874,746 | TFT, method of making and matrix displays incorporating the TFT |
| 6 | 5,737,041 | TFT, method of making and matrix displays incorporating the TFT |
| 7 | 5,731,216 | Method of making an active matrix display incorporating an improved TFT |
| 8 | 5,668,032 | Active matrix ESD protection and testing scheme |
| 9 | 5,162,931 | Method of manufacturing flat panel backplanes including redundant gate lines and displays made thereby |
| 10 | 5,123,847 | Method of manufacturing flat panel backplanes, display transistors |
| 11 | 5,075,591 | Matrix addressing arrangement for a flat panel display with field emission cathodes |
| 12 | 5,019,002 | Method of manufacturing flat panel backplanes including electrostatic discharge prevention and displays made thereby |
| 13 | 4,842,378 | Method of illuminating flat panel displays to provide CRT appearing displays |
| 14 | 4,820,222 | Method of manufacturing flat panel backplanes including improved testing and yields thereof and displays made thereby |
| 15 | 4,736,229 | Method of manufacturing flat panel backplanes, display transistors and displays made thereby |
| 16 | 4,651,185 | Method of manufacturing thin film transistors and transistors made thereby |
| 17 | 4,599,705 | Programmable cell for use in programmable electronic arrays |
| 18 | 4,545,112 | Method of manufacturing thin film transistors and transistors made thereby |
| 19 | 4,531,144 | Aluminum-refractory metal interconnect with anodized periphery |
| 20 | 4,499,557 | Programmable cell for use in programmable electronic arrays |
| 21 | 4,177,475 | High temperature amorphous memory device for an electrically alterable read-only memory |

Publications and Presentations

"Temperature and Pressure Dependence of the Optical and Electrical Gap in Chalcogenide Glasses" E A. Fagan, S.H. Holmberg, R W. Seguin, and J C. Thompson, Proc 10th Int Conf Phys Semicon.

"A Model for Photoconductivity in Amorphous Chalcogenide Alloys" T.C. Arnoldussen, R H Bube, E.A. Fagan, and S.H. Holmberg, J Non-Cryst. Solids 8-10, 933 (1972).

- "Analysis of Photoconductivity in Amorphous Chalcogenides". T.C. Arnoldussen, R.H. Bube, E.A. Fagan, and S.H. Holmberg, J Appl Phys. 43, 1798 (1972).
- "New Thin Film Tunnel Triode Using Amorphous Semiconductors". R.F. Shaw, H. Fritzsche, M. Silver, P. Smejtek, S.H. Holmberg and S.R. Ovshinsky, Appl Phys Lett. 20, 214 (1972).
- "Nanosecond Switching in Thin Amorphous Chalcogenide films". S.H. Holmberg and M.P. Shaw, Proc. 5th Int. Conf. on Amorphous and Liquid Semicon. (1973).
- "Reversible Switching in Thin Amorphous Chalcogenide Films — Electronic Effects". M.P. Shaw, S.H. Holmberg and S.A. Kostylev, Phys. Rev. Lett. 31, 542 (1973).
- "Evidence for Critical Field Switching in Amorphous Semiconductor Materials". W.D. Buckley and S.H. Holmberg, Phys. Rev. Lett. 32, 1429 (1974).
- "Electrical Characteristics and Threshold Switching in Amorphous Semiconductors". W.D. Buckley and S.H. Holmberg, Sol. State Elec. 18, 127 (1975).
- "Chalcogenide Memory Materials". Scott H. Holmberg, R.R. Shanks and V.A. Bluhm, J. Elec. Mater. 8, 333 (1979).
- "Active Matrix Liquid Displays Using Amorphous Silicon Thin Film Transistors". R.A. Flasck and S.H. Holmberg, IEEE Computer Graphics and Applications, Vol 4, 19-22 (1984).
- "Amorphous Silicon Thin Film Transistors (TFT) Driven Liquid Crystal Displays (LCD)". R.A. Flasck and S.H. Holmberg, Advances in Display Technology V, Elliott Schlam, Editor; Proceedings of SPIE, Vol 526, 94-98 (1985).

Unpublished Presentations

- "Amorphous Device Memories Based on the Ovonic Memory Switch". S.H. Holmberg, IEEE NVSM Workshop, (1979).
- "Nanosecond Switching Characteristics of Ovonic Threshold and Memory Switches". S.H. Holmberg, Workshop on Threshold Switching, (1980).
- "A U.S. Supplier of Active Matrix Liquid Displays". Scott H. Holmberg, Electronic Buyers News Forum on Flat Panel Displays, (1993).
- "An Overview of the Flat Panel Display Industry". Scott H. Holmberg, SEMI SMECS Program, (1994).

LISTING OF EMPLOYMENTS AND CONSULTANCIES

Scott H. Holmberg

1. All present employment and consultancies:
 - (a) LightSmith, Inc
3106 Las Palmas Ave.
Escondido, CA 92025
 - (b) Morrison & Foerster LLP
555 West Fifth Street, Suite 3500
Los Angeles CA 90013-1024

2. All prior employment and consultancies within the last four years:
 - (a) Cambrios Technologies Corp.
2450 Bayshore Parkway
Mountain View CA 94043
 - (b) McLaughlin Consulting Group
945 Hamilton Ave.
Menlo Park, CA 94025
 - (c) QualComm Inc.
5775 Morehouse Dr.
San Diego, CA 92121
 - (d) Ultradots, Inc.
48611 Warm Springs Blvd.
Fremont CA 94539
 - (e) Hoya Corporation USA
101 Metro Drive, Suite 500
San Jose, CA 95110
 - (f) Inflexion Point Strategy, LCC
706 Cowper Str. Suite 200
Palo Alto CA 94301
 - (g) Radiant Images, Inc
3 Preston Ct.
Bedford MA 01730

3. All present or prior relationships between the expert and LG.Philips LCD Co., Ltd., its subsidiaries, its affiliates, or other related entities:

(a) In 1998, I was retained by LG Electronics (one of LPL's parent companies) through Loeb & Loeb LLP in connection with LGE's assertion of U.S. Patent No. 5,019,002 against NEC.

(b) In 1999, I was retained by LG Electronics through Long Aldridge & Norman LLP in connection with LGE's assertion of U.S. Patent No. 5,019,002 against NEC.

4. A list of all cases in which the expert or consultant has testified at a deposition or in court within the last four years:

I have not testified at a deposition or in court within the last four years.

EXHIBIT C

HOWREY_{LLP}

1950 University Avenue, 4th Floor
East Palo Alto, CA 94303
T 650.798.3500
F 650.798.3600
www.howrey.com

March 3, 2006

Direct Dial: 650.798.3522
Facsimile: 650.798.3600
01450.0012.000000

Via Email and U.S. Mail

Gaspare J Bono, Esq.
McKenna Long & Aldridge LLP
1900 K Street, N.W.
Washington, D.C. 20006

Re: ***L.G. Philips LCD Co. v. Tatung Co. of America, et al., C.V. No. 05-292-JJF***

Dear Mr. Bono:

This letter responds to your letter of February 23, 2006, in which you identify Mr. Scott Holmberg as a consulting expert for LPL and state your intention to provide Mr. Holmberg with information produced by Defendants and designated as Confidential or Confidential Attorneys Only under the Stipulated Protective Order (the "Order") entered January 24, 2006 in the instant action.

Pursuant to Paragraph 2b(iii) of the Order, Defendants hereby object to disclosure of any Confidential and/or Confidential Attorneys Only information to Mr. Holmberg. This objection is timely lodged within the ten (10) business day period starting from the date of your February 23, 2006 letter, which ostensibly serves as your Paragraph 2(b)(ii) notice. Below we set forth the grounds of Defendants' objection.

First, Mr. Holmberg is the sole inventor of U.S. Patent No. 5,019,002 (the "'002 patent'"), one of the two patents-in-suit. He has been and continues to be active in the relevant technology field of the '002 patent, and the corresponding commercial space, namely, the semiconductor and display industries. [See, e.g., Curriculum Vitae of Mr. Holmberg ("Holmberg CV"), Professional Experience & List of Patents.] Mr. Holmberg's technical experiences coupled with his entrepreneurial pursuits make it clear that he constitutes an unequivocal competitive force, adverse to Defendants' technology and business interests. To guard against disclosure of confidential business and technology information to a party's business competitors is a principal object of protective orders in civil litigation. Disclosure to Mr. Holmberg confidential information from Defendants would short circuit the protection afforded by the Order entered in the instant action, and directly undercut its very object.

Second, the Order prohibits access to Confidential Attorneys Only information by individuals involved in the patent prosecution relating to the subject matters of patents-in-suit. [Order, ¶ 5.] To date Mr. Holmberg has twenty-one (21) patents issued to his name, and one (1) patent application pending, all in the same technology areas as the '002 patent. [Holmberg CV, List of Patents.] Undoubtedly, as a prolific inventor he remains actively engaged in "selecting or identifying the subject matter of [] patent claims, . . . [and] providing instruction, direction or advice regarding [the] prosecution activities." [Id.] For this reason alone, he should be denied access at least to Confidential Attorneys Only information

HOWREY

Gaspare J Bono
March 3, 2006
Page 2

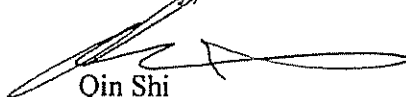
Third, Mr. Holmberg is a fact witness in the instant action as inventor of the '002 patent. His acting also as an expert witness would cause confusion in the jury, and thereby prejudice Defendants. Allowing him access to Defendants' confidential technology and business information would exacerbate this likelihood of prejudice and confusion.

Fourth, to the extent Plaintiffs proffer a cure of the above-mentioned problems of such disclosure by forcing Mr. Holmberg to separate in his mind Defendants' confidential information he received, it should be noted that it is unrealistic to order Mr. Holmberg to "turn off" his mental processes to avoid invocation of knowledge sourced to Defendants' confidential information. This is because, for a specialist like Mr. Holmberg, uninterrupted assimilation of information intake renders it impossible to separate what he might learn from Defendants' confidential information from his mental knowledgebase.

For the foregoing reasons, Defendants object to disclosure of any Confidential and/or Confidential Attorneys Only information to Mr. Holmberg. Given this objection, LPL is prohibited from effecting any such disclosure for the ensuing five (5) court days. [Order, ¶ 2b(iii).] The Court encourages informal resolution of such objections. *Id.* Accordingly, we propose to meet and confer on Tuesday, March 7, or Wednesday, March 8, regarding our objection, so as to resolve this issue efficiently. Please advise your availability for a meet and confer on either of those two days.

In the event the parties fail to resolve this issue informally, we intend to move the Court for an order to bar disclosure of such information to Mr. Holmberg prior to the expiration of the aforementioned five (5) court day period.

Sincerely,



Qin Shi

QS/leh

Cc: Matthew W. King
J. James Li
Julie Gabler
David P. Owen
Christine Dudzik